

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)

Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12

PENALTY COMPUTATION WORKSHEET

COUNT 1G

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

Previous Violations:

Date of Requirement: 12/22/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 542
2. Number of Tanks: 16

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures		
(per UST or facility):	\$550.00	Basis: UST test cost estimate
Delayed Expenditures		
(per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	12.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$8,800.00

AC = Avoided Expenditures x Number of USTs

4. Calculated Delayed Cost: \$.00

DC = (Delayed Expenditures x Interest x Days)/365 days

5. Economic Benefit Component: \$9,853.00

From EPA's BEN computer model

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

Extent of Deviation

<i>Potential for Harm</i>	<i>Extent of Deviation</i>		
	Major	Moderate	Minor
	Major	\$1500	\$1000
	Moderate	750	500
	Minor	200	100
			50

6. Matrix Value (MV): \$1,500

7. Total MV: \$24,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$24,000	\$0.00
9. Degree of willfulness or negligence:	0	\$24,000	\$0.00
10. History of noncompliance:	0	\$24,000	\$0.00
11. Unique factors:	0	\$24,000	\$0.00
12. Adjusted Matrix Value:			\$24,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 3

15. Gravity-Based Component: \$72,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$9,853.00 |
| 17. Gravity-Based Component: | \$72,000.00 |
| 18. Initial Penalty Target Figure: | \$81,853.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)

Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12

PENALTY COMPUTATION WORKSHEET

COUNT 1H

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corperation
Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

Previous Violations:

Date of Requirement: 02/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 501
2. Number of Tanks: 8

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures		
(per UST or facility):	\$550.00	Basis: UST test cost estimate
Delayed Expenditures		
(per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	12.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$4,400.00

AC = Avoided Expenditures x Number of USTs

4. Calculated Delayed Cost: \$.00

DC = (Delayed Expenditures x Interest x Days)/365 days

5. Economic Benefit Component: \$4,927.00

From EPA's BEN computer model

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$12,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$12,000	\$0.00
9. Degree of willfulness or negligence:	0	\$12,000	\$0.00
10. History of noncompliance:	0	\$12,000	\$0.00
11. Unique factors:	0	\$12,000	\$0.00
12. Adjusted Matrix Value:			\$12,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 3

15. Gravity-Based Component: \$72,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$4,927.00 |
| 17. Gravity-Based Component: | \$72,000.00 |
| 18. Initial Penalty Target Figure: | \$76,927.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET

COUNT 1I

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

Previous Violations:

Date of Requirement: 08/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 320
2. Number of Tanks: 10

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures		
(per UST or facility):	\$550.00	Basis: UST test cost estimate
Delayed Expenditures		
(per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	12.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$5,500.00

AC = Avoided Expenditures x Number of USTs

4. Calculated Delayed Cost: \$.00

DC = (Delayed Expenditures x Interest x Days)/365 days

5. Economic Benefit Component: \$2,373.00

From EPA's BEN computer model

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$15,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$15,000	\$0.00
9. Degree of willfulness or negligence:	0	\$15,000	\$0.00
10. History of noncompliance:	0	\$15,000	\$0.00
11. Unique factors:	0	\$15,000	\$0.00
12. Adjusted Matrix Value:			\$15,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 2.5

15. Gravity-Based Component: \$75,000.00
Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$2,373.00 |
| 17. Gravity-Based Component: | \$75,000.00 |
| 18. Initial Penalty Target Figure: | \$77,373.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)

Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET

COUNT 1J

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corperation
Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

Previous Violations:

Date of Requirement: 12/22/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 177
2. Number of Tanks: 28

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$550.00 Basis: UST test cost estimate
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 12.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$15,400.00
AC = Avoided Expenditures x Number of USTs
4. Calculated Delayed Cost: \$.00
DC = (Delayed Expenditures x Interest x Days)/365 days
5. Economic Benefit Component: \$6,644.00
From EPA's BEN computer model

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$42,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$42,000	\$0.00
9. Degree of willfulness or negligence:	0	\$42,000	\$0.00
10. History of noncompliance:	0	\$42,000	\$0.00
11. Unique factors:	0	\$42,000	\$0.00
12. Adjusted Matrix Value:			\$42,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 1.5

15. Gravity-Based Component: \$126,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|--------------|
| 16. Economic Benefit Component: | \$6,644.00 |
| 17. Gravity-Based Component: | \$126,000.00 |
| 18. Initial Penalty Target Figure: | \$132,644.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET

COUNT 1K

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

Previous Violations:

Date of Requirement: 12/22/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 177
2. Number of Tanks: 33

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures		
(per UST or facility):	\$550.00	Basis: UST test cost estimate
Delayed Expenditures		
(per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	12.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$18,150.00

AC = Avoided Expenditures x Number of USTs

4. Calculated Delayed Cost: \$.00

DC = (Delayed Expenditures x Interest x Days)/365 days

5. Economic Benefit Component: \$7,830.00

From EPA's BEN computer model

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$49,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$49,500	\$0.00
9. Degree of willfulness or negligence:	0	\$49,500	\$0.00
10. History of noncompliance:	0	\$49,500	\$0.00
11. Unique factors:	0	\$49,500	\$0.00
12. Adjusted Matrix Value:			\$49,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 1.5

15. Gravity-Based Component: \$74,250.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(a)
Failure to monitor tanks at least every 30 days.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements was calculated by obtaining three cost estimates from NYSDEC licensed UST system tightness testing contractors. These values were then input into EPA's BEN computer model to determine actual economic benefit derived from the initial date of non-compliance.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$7,830.00 |
| 17. Gravity-Based Component: | \$74,250.00 |
| 18. Initial Penalty Target Figure: | \$82,080.00 |

PENALTY COMPUTATION WORKSHEET

COUNT 2A

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corperation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 12/22/89
Date of Record Review: 06/16/92

1. Days of noncompliance: 907
2. Number of Piping: 125

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

<i>Potential for Harm</i>	<i>Extent of Deviation</i>		
	Major	Moderate	Minor
	Major	\$1500	\$1000
	Moderate	750	500
	Minor	200	100
			50

6. Matrix Value (MV): \$1,500

7. Total MV: \$187,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$187,500	\$0.00
9. Degree of willfulness or negligence:	0	\$187,500	\$0.00
10. History of noncompliance:	0	\$187,500	\$0.00
11. Unique factors:	0	\$187,500	\$0.00
12. Adjusted Matrix Value:			\$187,500.00
			0

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 4

15. Gravity-Based Component: \$1,500,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|----------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$1,500,000.00 |
| 18. Initial Penalty Target Figure: | \$1,500,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1A.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET COUNT 2B

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 12/22/89
Date of Record Review: 06/16/92

1. Days of noncompliance: 907
2. Number of Tanks: 49

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$

4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$

5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$73,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$73,500	\$0.00
9. Degree of willfulness or negligence:	0	\$73,500	\$0.00
10. History of noncompliance:	0	\$73,500	\$0.00
11. Unique factors:	0	\$73,500	\$0.00
12. Adjusted Matrix Value:			\$73,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 4

15. Gravity-Based Component: \$294,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|--------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$294,000.00 |
| 18. Initial Penalty Target Figure: | \$294,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1B.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12

PENALTY COMPUTATION WORKSHEET

COUNT 2C

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 01/01/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 897
2. Number of Tanks: 5

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures (per UST or facility):	\$	Basis:
Delayed Expenditures (per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	18.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days) / 365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days) / 365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$7,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$7,500	\$0.00
9. Degree of willfulness or negligence:	0	\$7,500	\$0.00
10. History of noncompliance:	0	\$7,500	\$0.00
11. Unique factors:	0	\$7,500	\$0.00
12. Adjusted Matrix Value:			\$7,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 4

15. Gravity-Based Component: \$60,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$60,000.00 |
| 18. Initial Penalty Target Figure: | \$60,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1C.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET COUNT 2D

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to monitor tanks at least every 30 days, if appropriate.

Previous Violations:

Date of Requirement: 03/01/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 838
2. Number of Tanks: 13

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures (per UST or facility):	\$	Basis:
Delayed Expenditures (per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	18.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days) / 365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days) / 365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$19,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$19,500	\$0.00
9. Degree of willfulness or negligence:	0	\$19,500	\$0.00
10. History of noncompliance:	0	\$19,500	\$0.00
11. Unique factors:	0	\$19,500	\$0.00
12. Adjusted Matrix Value:			\$19,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 4

15. Gravity-Based Component: \$156,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|--------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$156,000.00 |
| 18. Initial Penalty Target Figure: | \$156,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to monitor tanks at least every 30 days, if appropriate.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1D.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET COUNT 2E

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 07/01/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 716
2. Number of Piping: 13

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major

Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$19,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$19,500	\$0.00
9. Degree of willfulness or negligence:	0	\$19,500	\$0.00
10. History of noncompliance:	0	\$19,500	\$0.00
11. Unique factors:	0	\$19,500	\$0.00
12. Adjusted Matrix Value:			\$19,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 3.5

15. Gravity-Based Component: \$136,500.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|--------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$136,500.00 |
| 18. Initial Penalty Target Figure: | \$136,500.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1E.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET

COUNT 2F

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corperation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 10/01/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 624
2. Number of Piping: 5

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
$$AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$$
4. Calculated Delayed Cost: \$.00
$$DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$$
5. Economic Benefit Component: \$.00
$$Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$7,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$7,500	\$0.00
9. Degree of willfulness or negligence:	0	\$7,500	\$0.00
10. History of noncompliance:	0	\$7,500	\$0.00
11. Unique factors:	0	\$7,500	\$0.00
12. Adjusted Matrix Value:			\$7,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 3.5

15. Gravity-Based Component: \$26,250.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$26,250.00 |
| 18. Initial Penalty Target Figure: | \$26,250.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1F.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12.

PENALTY COMPUTATION WORKSHEET COUNT 2G

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 12/22/90
Date of Record Review: 06/16/92

1. Days of noncompliance: 542
2. Number of Piping: 16

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
$$AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$$
4. Calculated Delayed Cost: \$.00
$$DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$$
5. Economic Benefit Component: \$.00
$$Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$24,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$24,000	\$0.00
9. Degree of willfulness or negligence:	0	\$24,000	\$0.00
10. History of noncompliance:	0	\$24,000	\$0.00
11. Unique factors:	0	\$24,000	\$0.00
12. Adjusted Matrix Value:			\$24,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 3

15. Gravity-Based Component: \$72,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

16. Economic Benefit Component:	\$.00
17. Gravity-Based Component:	\$72,000.00
18. Initial Penalty Target Figure:	\$72,000.00

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1G.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12.

PENALTY COMPUTATION WORKSHEET COUNT 2H

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 02/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 501
2. Number of Piping: 8

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00

$$AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days) / 365\ days] \times (1 - Wid.\ Tax\ Rate)$$

4. Calculated Delayed Cost: \$.00

$$DC = (Delayed\ Expenditures \times Interest \times Days) / 365\ days$$

5. Economic Benefit Component: \$.00

$$Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$12,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$12,000	\$0.00
9. Degree of willfulness or negligence:	0	\$12,000	\$0.00
10. History of noncompliance:	0	\$12,000	\$0.00
11. Unique factors:	0	\$12,000	\$0.00
12. Adjusted Matrix Value:			\$12,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 3

15. Gravity-Based Component: \$72,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

16. Economic Benefit Component:	\$.00
17. Gravity-Based Component:	\$72,000.00
18. Initial Penalty Target Figure:	\$72,000.00

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1H.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET COUNT 2I

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 08/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 320
2. Number of Piping: 10

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures (per UST or facility):	\$	Basis:
Delayed Expenditures (per UST or facility):	\$	Basis:
Weighted Tax Rate:	34.00	Source:
Interest Rate:	18.10	Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

	Extent of Deviation		
	Major	Moderate	Minor
Potential for Harm			
Major	\$1500	\$1000	\$500
Moderate	750	500	250
Minor	200	100	50

6. Matrix Value (MV): \$1,500
7. Total MV: \$15,000
- Total MV = Number of tanks (or facilities) x MV*

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$15,000	\$0.00
9. Degree of willfulness or negligence:	0	\$15,000	\$0.00
10. History of noncompliance:	0	\$15,000	\$0.00
11. Unique factors:	0	\$15,000	\$0.00
12. Adjusted Matrix Value:			\$15,000.00
<i>Adjusted Matrix Value = Total MV + Dollar Adjustments</i>			

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2
14. Days of Noncompliance Multiplier (DNM): 2.5
15. Gravity-Based Component: \$75,000.00
- Gravity-based Component = Adjusted Matrix Value x ESM x DNM*

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$75,000.00 |
| 18. Initial Penalty Target Figure: | \$75,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 11.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET

COUNT 2J

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)
Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 12/22/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 177
2. Number of Piping: 28

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 39.90 Source:
Interest Rate: 12.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$

4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$

5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$42,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$42,000	\$0.00
9. Degree of willfulness or negligence:	0	\$42,000	\$0.00
10. History of noncompliance:	0	\$42,000	\$0.00
11. Unique factors:	0	\$42,000	\$0.00
12. Adjusted Matrix Value:			\$42,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 1.5

15. Gravity-Based Component: \$126,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|--------------|
| 16. Economic Benefit Component: | \$0.00 |
| 17. Gravity-Based Component: | \$126,000.00 |
| 18. Initial Penalty Target Figure: | \$126,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1J.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: UST located above a designated sole source aquifer.

PENALTY COMPUTATION WORKSHEET COUNT 2K

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

Previous Violations:

Date of Requirement: 12/22/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 177
2. Number of Piping: 33

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$ Basis:
Delayed Expenditures
(per UST or facility): \$ Basis:
Weighted Tax Rate: 34.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days) / 365\ days] \times (1 - Wtd.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days) / 365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$49,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$49,500	\$0.00
9. Degree of willfulness or negligence:	0	\$49,500	\$0.00
10. History of noncompliance:	0	\$49,500	\$0.00
11. Unique factors:	0	\$49,500	\$0.00
12. Adjusted Matrix Value:			\$49,500.00
<i>Adjusted Matrix Value = Total MV + Dollar Adjustments</i>			

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: Low

13. Environmental Sensitivity Multiplier (ESM): 1

14. Days of Noncompliance Multiplier (DNM): 1.5

15. Gravity-Based Component: \$74,250.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$0.00 |
| 17. Gravity-Based Component: | \$74,250.00 |
| 18. Initial Penalty Target Figure: | \$74,250.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.41(b)

Failure to use any underground piping monitoring method.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system tightness testing requirements for this count was included in the calculation for Count 1K.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: As per OSWER Directive 9610.12.

PENALTY COMPUTATION WORKSHEET COUNT 3A

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.70(c)
Failure to permanently close or upgrade a temporarily closed tank system after 12 months.

Previous Violations:

Date of Requirement: 08/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 320
2. Number of Tank/Facil: 10

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$0.00 Basis:
Delayed Expenditures
(per UST or facility): \$0.00 Basis:
Weighted Tax Rate: 15.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$15,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$15,000	\$0.00
9. Degree of willfulness or negligence:	0	\$15,000	\$0.00
10. History of noncompliance:	0	\$15,000	\$0.00
11. Unique factors:	0	\$15,000	\$0.00
12. Adjusted Matrix Value:			\$15,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 2.5

15. Gravity-Based Component: \$75,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$.00 |
| 17. Gravity-Based Component: | \$75,000.00 |
| 18. Initial Penalty Target Figure: | \$75,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.70(c)

Failure to permanently close or upgrade a temporarily closed tank system after 12 months.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system permanent closures or upgrades was determined to be less than \$2,500.00, and is therefore negligible.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above a sole source aquifer and in a highly populated area.

PENALTY COMPUTATION WORKSHEET COUNT 3B

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.70(c)
Failure to permanently close or upgrade a temporarily closed tank system after 12 months.

Previous Violations:

Date of Requirement: 04/01/91
Date of Record Review: 06/16/92

1. Days of noncompliance: 442
2. Number of Tank/Facil: 10

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$0.00 Basis:
Delayed Expenditures
(per UST or facility): \$0.00 Basis:
Weighted Tax Rate: 15.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days)/365\ days] \times (1 - Wid.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days)/365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		Extent of Deviation		
		Major	Moderate	Minor
Potential for Harm	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$15,000

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	% Change (+/-)	Total Tank Matrix Value	Dollar Adjustment
8. Degree of cooperation or noncooperation:	0	\$15,000	\$0.00
9. Degree of willfulness or negligence:	0	\$15,000	\$0.00
10. History of noncompliance:	0	\$15,000	\$0.00
11. Unique factors:	0	\$15,000	\$0.00
12. Adjusted Matrix Value:			\$15,000.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 3

15. Gravity-Based Component: \$90,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|-------------|
| 16. Economic Benefit Component: | \$0.00 |
| 17. Gravity-Based Component: | \$90,000.00 |
| 18. Initial Penalty Target Figure: | \$90,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.70(c)

Failure to permanently close or upgrade a temporarily closed tank system after 12 months.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with UST system permanent closures or upgrades was determined to be less than \$2,500.00, and is therefore negligible.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above a sole source aquifer and in a highly populated area.

PENALTY COMPUTATION WORKSHEET

COUNT 4

PART 1: BACKGROUND

Respondent's Name: Gaseteria Oil Corporation
Regulation Violated: 40 C.F.R. § 280.34
Failure to furnish information.

Previous Violations:

Date of Requirement: 05/13/92
Date of Record Review: 06/16/92

1. Days of noncompliance: 33
2. Number of Facilities: 1

PART 2: ECONOMIC BENEFIT COMPONENT

Avoided Expenditures
(per UST or facility): \$0.00 Basis:
Delayed Expenditures
(per UST or facility): \$0.00 Basis:
Weighted Tax Rate: 15.00 Source:
Interest Rate: 18.10 Source: Equity discount rate.

3. Calculated Avoided Cost: \$.00
 $AC = [Avoided\ Expenditures + (Avoided\ Expenditures \times Interest \times Days) / 365\ days] \times (1 - Wid.\ Tax\ Rate)$
4. Calculated Delayed Cost: \$.00
 $DC = (Delayed\ Expenditures \times Interest \times Days) / 365\ days$
5. Economic Benefit Component: \$.00
 $Economic\ Benefit = Number\ of\ USTs \times (AC + DC)$

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Potential for Harm: Major Extent of Deviation: Major

Matrix Value Table:

		<i>Extent of Deviation</i>		
		Major	Moderate	Minor
<i>Potential for Harm</i>	Major	\$1500	\$1000	\$500
	Moderate	750	500	250
	Minor	200	100	50

6. Matrix Value (MV): \$1,500

7. Total MV: \$1,500

Total MV = Number of tanks (or facilities) x MV

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

	<i>% Change (+/-)</i>	<i>Total Tank Matrix Value</i>	<i>Dollar Adjustment</i>
8. Degree of cooperation or noncooperation:	0	\$1,500	\$0.00
9. Degree of willfulness or negligence:	0	\$1,500	\$0.00
10. History of noncompliance:	0	\$1,500	\$0.00
11. Unique factors:	0	\$1,500	\$0.00
12. Adjusted Matrix Value:			\$1,500.00

Adjusted Matrix Value = Total MV + Dollar Adjustments

PART 5: GRAVITY-BASED COMPONENT

Level of Environmental Sensitivity: High

13. Environmental Sensitivity Multiplier (ESM): 2

14. Days of Noncompliance Multiplier (DNM): 1

15. Gravity-Based Component: \$3,000.00

Gravity-based Component = Adjusted Matrix Value x ESM x DNM

PART 6: INITIAL PENALTY TARGET FIGURE

- | | |
|------------------------------------|------------|
| 16. Economic Benefit Component: | \$0.00 |
| 17. Gravity-Based Component: | \$3,000.00 |
| 18. Initial Penalty Target Figure: | \$3,000.00 |

NARRATIVE TO SUPPORT COMPLAINT AMOUNT

Regulation Violated: 40 C.F.R. § 280.34
Failure to furnish information.

PART 2: ECONOMIC BENEFIT COMPONENT

Justification for Economic Benefit: The economic benefit derived from non-compliance with requirements to furnish information was determined to be negligible.

PART 3: MATRIX VALUE FOR THE GRAVITY-BASED COMPONENT

Justification for Potential for Harm: As per OSWER Directive 9610.12

Justification for Extent of Deviation: As per OSWER Directive 9610.12

PART 4: VIOLATOR-SPECIFIC ADJUSTMENTS TO MATRIX VALUE

Justification for Degree of Cooperation/Noncooperation:

Justification for Degree of Willfulness or Negligence:

PART 5: GRAVITY-BASED COMPONENT

Justification for Level of Environmental Sensitivity: USTs located above an EPA designated sole source aquifer.



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NYD059358236

INSTALLATION ADDRESS

GULF OIL COMPANY - U. S.
364 HASPETH AVENUE
BROOKLYN NY 11211

364 HASPETH AVENUE
BROOKLYN NY 11211



ACKNOWLEDGEMENT OF NOTIFICATION OF
HAZARDOUS WASTE ACTIVITY

08/17/98

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER →	NYD059358234
INSTALLATION NAME →	DITMAS OIL ASSOCIATES INC
INSTALLATION ADDRESS →	364 MASPETH AVE BROOKLYN, NY 11211
MAILING ADDRESS →	364 MASPETH AVE BROOKLYN, NY 11211

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY, 22nd Floor
NEW YORK, NEW YORK 10007-1866

ATTN: DIV OF ENVIRON PLANNING & PROTECTION
RCRA PROGRAMS BRANCH

TO: PORCELLI, ROBERTO
364 MASPETH AVE
BROOKLYN, NY 11211

To avoid delays in processing, please complete all sections.

Only original signature of the Generator is acceptable.

Please print or type with ELITE.

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

98 AUG -6 PM 12:10

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☒ A. First Notification

☐ B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

NYD059358234

II. Name of Installation (Include company and specific site name)

DITMAS OIL ASSOCIATES INC.

III. Location of Installation Requires Building Number or Latitude and Longitude for processing.

Street

364 MASPETH Avenue

Street (Continued)

City or Town

Brooklyn

State

Zip Code

NY

11211

COUNTY CODE

County Name

047 Kings

IV. Installation Mailing Address

Street or P.O. Box

SAME

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

PORCEZZI

ROBERTO

Job Title

Phone Number (Area Code and Number)

718-782-4200

VI. Installation Contact Address

A. Contract Address
Location Mailing Other

B. Street or P.O. Box

☒ ☐ ☐

City or Town

State

Zip Code

VII. Ownership PROPERTY

A. Name of Installation's Legal Owner

DITMAS OIL ASSOCIATES INC.

Street, P.O. Box, or Route Number

SAME AS ABOVE

City or Town

State

Zip Code

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)
Month Day Year

060198

P

P

Yes

No

060198

From: Jack Hoyt, AWMD, EPA, Region 2, 290 Broadway, 22 Fl.
New York, NY 10007-1866. Tel: (212) 637 4106

Call Change (Owner) Airborne Exp

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to instructions)

A. Hazardous Waste Activity

1. Generator (See instructions)

- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
☒ b. 100 to 1000 kg/mo (200-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)

- ☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☒ 3. Highway
☐ 4. Water
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace

- ☐ 1. Smelter Deferral
☐ 2. Small Quantity Exemption
Indicate Type of Combustion Device(s)

- ☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace

- ☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer

- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)

- ☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace

3. Used Oil Transporter - Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
☐ b. Transfer Facility

4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)

- ☐ a. Process
☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)



2. Corrosive (D002)



3. Reactive (D003)



4. Toxicity Characteristic



(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

D0018

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 D0001	2 D0018	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature ORIGINAL

Name and Official Title (Type or print)

TERMINAL SUPERVISOR

Date Signed

8-5-98

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

I.D. -- FOR OFFICIAL USE ONLY														
S	W	1	2	3	4	5	6	7	8	9	10	11	12	13
T/A	C											1		

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K049	K051	K052			
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
<i>William J. Kaiser</i>	WILLIAM J. KAISER TERMINAL MGR.	7/21/80

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*****
*                               RCRIS: Notification Add/Update Screen 2                               *
*****
*EPA ID: NYD059358234      Other ID:                               Merge Send: Y                               *
*Date Received(MMDDYY): 072980      Source( N/E/S ): N Non-Notifier Flag:                               *
*Date Acknowledged (MMDDYYYY): 11071980      Send Acknowledgement:                               *
*Name of Installation: GULF OIL CORP                               *
*                               Installation Location Address                               *
*Streets: 364 MASPETH AVE                               *
*City: BROOKLYN                               State: NY      Zip: 11211                               *
*County Code: 047      County Name: KINGS                               *
* Installation Mailing Address (Type 'SAME' if same as Above)                               *
*Streets: 364 MASPETH AVE                               *
*City: BROOKLYN                               State: NY      Zip: 11211                               *
*                               Contact Information                               *
* Last Name      First Name      Title      Phone      Address(M,L,O) *
* KAISER      WILLIAM J      TERMINAL MGR      7183888114      L                               *
*Streets: 364 MASPETH AVE                               *
*City: BROOKLYN                               State: NY      Zip: 11211                               *
*Land Type:                               *
*****
*****
*                               RCRIS: Notification Add/Update Screen 3                               *
*****
* EPA ID: NYD059358234      Other ID:                               Source: N                               *
*                               *                               *
* Owner Sequence Number: 1                               *
* Ownership: GULF OIL CORP                               Type of Owner: P                               *
*                               *                               *
*                               Address of Owner                               *
*                               *                               *
* Street: 433 HACKENSACK AVE                               *
* City: HACKENSACK                               State: NJ      Zip Code 07601                               *
* Phone: 2014884700                               *
*                               *                               *
* Current/Previous Indicator: CO      Change Date(MMDDYY):                               *
*                               *                               *
*                               *                               *
*****
* Enter-Continue      F3-Exit      F4-Exit Group Process      F5-Curr. Owner *
* F6-Prev. Owner      F8-Help      F9-First      F10-Next                               *
*****

```

York 1/10

WC. D000, D001, K049, K051, K052

Jeff Mess 8/7/98 1:30

Litman brought the property per Roberts 8/10/98 11:18

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		F N Y D 0 5 93 58 2 34	
I. EPA I.D. NUMBER				T/A C	
III. FACILITY NAME				D	
V. FACILITY MAILING ADDRESS				13 14 15	
VI. FACILITY LOCATION					
				GENERAL INSTRUCTIONS	
				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		YES	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP GULF OIL CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 KAISER WILLIAM J. TERMINAL MGR	212	388	8114

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3 364 MASPETH AVENUE		4 BROOKLYN	NY	11211	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 364 MASPETH AVENUE		KINGS		BROOKLYN	NY	11211	

VII. SIC CODES (4-digit, in order of priority)

VIII. OPERATOR INFORMATION

15	16
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)	

E. STREET OR P.O. BOXF. CITY OR TOWN

X. EXISTING ENVIRONMENTAL PERMITS

B. UIC (Underground Injection of Fluids)

C. RCRA (Hazardous Wastes)

XI. MAP

XII. NATURE OF BUSINESS (provide a brief description)

XIII. CERTIFICATION (see instructions)

B. SIGNATURE

C. DATE SIGNED	
----------------	--

NOV. 07 1980

COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-1 (6-80)

REVERSE

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			NY D 0 5 9 3 5 8 2 3 4											

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS N.A.

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP											
13 14 15											
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)			
X-1	S 0 2	600	G		5	S0 2	772,538	G			
X-2	T 0 3	20	E		6	S0 2	198,526	G			
*1	S 02	999 999 999 6000	G		*7	T01	7,200 000	4			
2	S 02	1080	G		8						
3	S 02	1,349,880	G		9						
4	S 02	1,321,236	G		10						

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS.....P
 TONS.....T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS.....K
 METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. X-1 X-2 X-3 X-4	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W N Y D 0 59 35 82 3 4													W DUP													
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15													1 2 3 4 5 6 7 8 9 10 11 12 13 14 15													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES															
	23	24	25	26	27	28	29	30	31	32	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
1	K	0	51		1	3	00		T		S	02	T	01												
2	K	0	49		3	2	00		T		S	02														
3	K	0	52		1	5	00		T		S	02														
4	K	0	49		1	1	00		T		S	02														
5	K	0	49		1	0	00		T		S	02														
6	K	0	49		1	1	00		T		S	02														
7																										
8																										
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23																										
24																										
25																										
26																										

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

F6:A 55 F6:A 56

EPA I.D. NO. (enter from page 1)													
S												T/A	C
F	N	Y	D	0	5	9	3	5	8	2	3	4	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility (*see instructions for more detail*).

VI. PHOTOGRAPHS

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)					LONGITUDE (degrees, minutes, & seconds)				
4	0	4	3	050	0	7	3	55	450
85	86	87	88	89 - 91	72 - 74	75	76	77 - 79	

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																						
C																																					
E																																					
15	16														55	56	58	59	61	62	65																
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.		6. ZIP CODE										
C																C																					
F																G																					
45	46														45	15	16														40	41	42	47			51

IX. OWNER CERTIFICATION

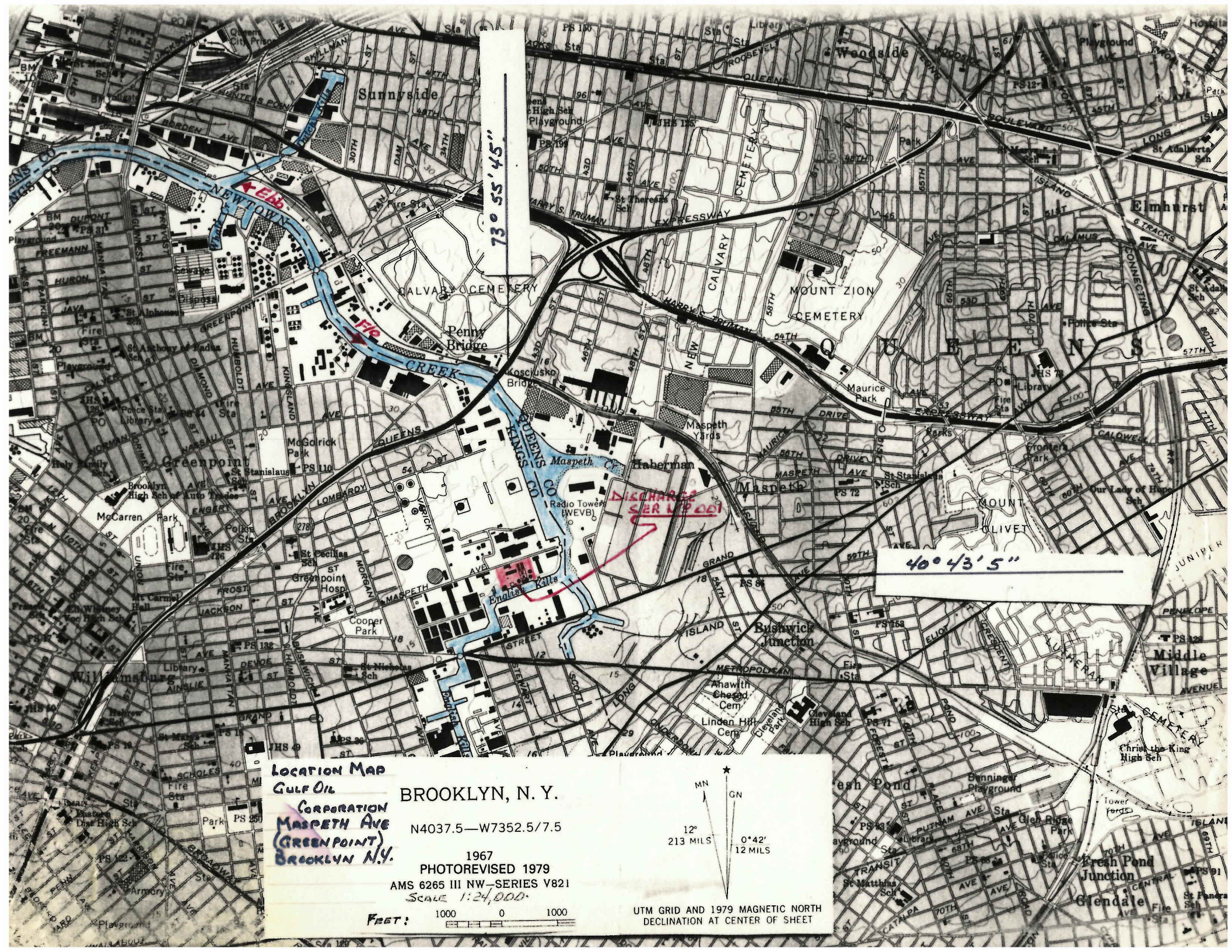
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

<p>A. NAME (print or type)</p> <p>R. E. WOHLGEMUTH</p> <p>VICE PRESIDENT-NORTHERN REGION</p>	<p>B. SIGNATURE</p> 	<p>C. DATE SIGNED</p> <p>NOV. 07 1980</p>
--	--	---

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------



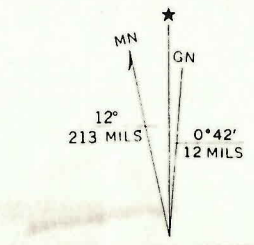
LOCATION MAP
GULF OIL
CORPORATION
MASPETH AVE
GREENPOINT
BROOKLYN N.Y.

BROOKLYN, N. Y.

N4037.5—W7352.5/7.5

1967
PHOTOREVISED 1979
AMS 6265 III NW—SERIES V821
SCALE 1:24,000

FEET: 1000 0 1000



UTM GRID AND 1979 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

19

1900-1901

1901-1902

1902-1903

McGraw-Hill
Engineering
and
Architecture
Division
New York, N.Y.
10017

Gulf Oil Company - U.S.

364 Maspeth Avenue
Brooklyn, New York 11211

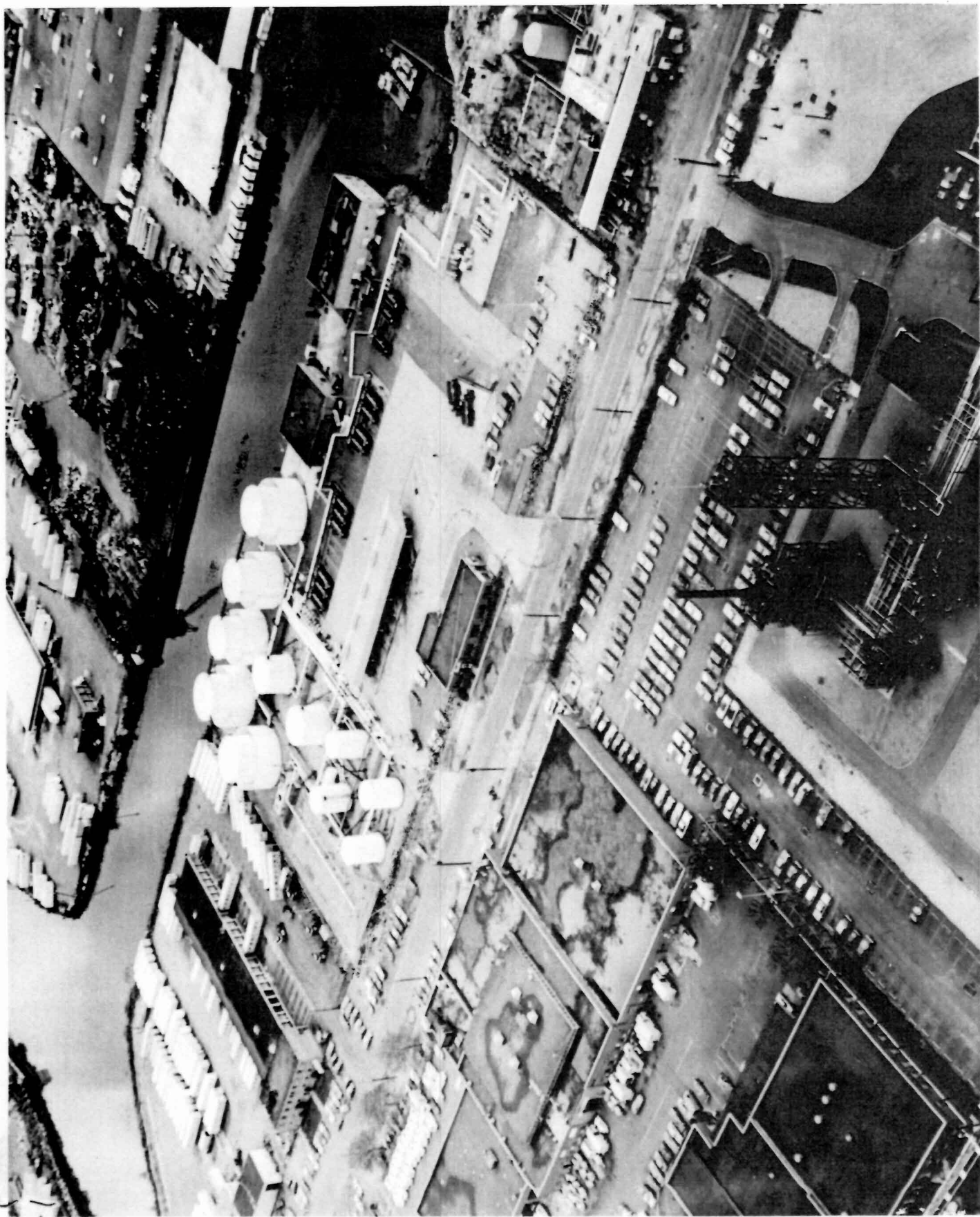
EPA I.D. NUMBER: NYDO59358234

Reference Item X: Existing Environmental Permits

Shown below is a list of operating are contamination sources:

VAPOR RECOVERY UNIT	A-610000	4013	0001A
Tank 103	"	"	00103
" 104	"	"	00104
" 107	"	"	00107
" 112	"	"	00112
" 113	"	"	00113
" 114	"	"	00114





SCALE 1"=80.0'

□ = Storm Drains
--- = Lines to oil/water separator

- MASPETH AVE -

GULF OIL CORPORATION
364 MASPETH AVE
BROOKLYN, N.Y.

EL 627.13

FIRE STATION

OFFICE

TRENCH DRAINS

FUEL ISLAND

TRENCH DRAIN

STORAGE AREA

10 BAY LOADING AREA (TRUCK)

CONCRETE DICE

3 MOUNDED
OVER TANKS
(GASOLINE)

VAPOR RECOVERY
UNIT EMISSION
POINT #0001A

OIL/WATER
SEPARATOR

WAREHOUSE

GARAGE

STEEL FIRE WALLS

EL 690.7

U.S. PIERHEAD AND BULKHEAD LINE

- ENGLISH KILLS -

EL 410.24

GULF OIL NYDC59358234

EL 385.39

50.05
20.23

108
109
110

00101
00102

00106
00103

00104

00105

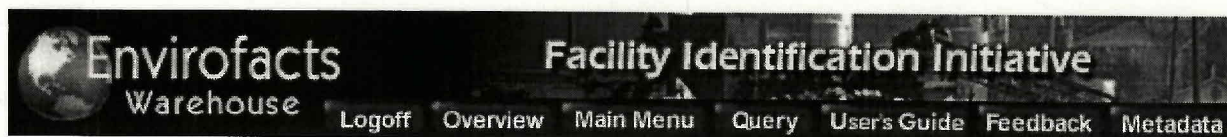
00111

00107

00112

00113

00114



Facility Information

EPA Facility ID	Facility Name	Location Address	City,County,State,Zip	Source
NYD0-5935-8234	GASETERIA OIL COMPANY	364 MASPETH AVENUE	BROOKLYN , KINGS , NY , 11211	AIRS/AFS

List of Program Records

EPA Facility ID	System Acronym	System ID	Facility Name	Location Address	City,County,State,Z
NYD0-5935-8234	PCS	NY0005789	TERMINNALLE	364 MASPETH AVENUE	BROOKLYN , KING , NY , 11211
NYD0-5935-8234	AIRS/AFS	NY0854588	GASETERIA OIL COMPANY	364 MASPETH AVENUE	BROOKLYN , KING , NY , 11211
NYD0-5935-8234	AIRS/AFS	NY0762209	TERMINNALLE CORP (FORMERLY GULF OIL/GRE)	364 MASPETH AVE	BROOKLYN , KING , NY , 11201
NYD0-5935-8234	RCRIS	NYD059358234	DITMAS OIL ASSOCIATES INC	364 MASPETH AVE	BROOKLYN , KING , NY , 11211
NYD0-5935-8234	AIRS/AFS	NY0942432	TERMINELLE GAS (DUPL. USE 00038 INSTEAD)	364 MASPETH AVENUE	BROOKLYN , KING , NY , 11211
NYD0-5935-8234	DOCKET	02-92-0169-0001	GULF OIL CORPORATION	364 MASPETH AVE	BROOKLYN , KING , NY , 11211
NYD0-5935-8234	DOCKET	02-93-0097-0001	GULF OIL CORP	364 MASPETH AVE	BROOKLYN , KING , NY , 11211

List of Reported SIC Codes

System Acronym	System ID	Source	SIC Code	Description
PCS	NY0005789		5171(Primary)	PETROLEUM BULK STATIONS AND TERMINALS
AIRS/AFS	NY0854588		2911(Primary)	PETROLEUM REFINING
AIRS/AFS	NY0762209		5171(Primary)	PETROLEUM BULK STATIONS AND TERMINALS
RCRIS	NYD059358234	FACILITY	5171(Primary)	PETROLEUM BULK STATIONS AND TERMINALS
AIRS/AFS	NY0942432		5171(Primary)	PETROLEUM BULK STATIONS AND TERMINALS
DOCKET	02-92-0169-0001	DOCKET LOAD	5171(Primary)	PETROLEUM BULK STATIONS AND TERMINALS

List of Reported NAICS Codes

System Acronym	System ID	Source	NAICS Code	Description
----------------	-----------	--------	------------	-------------

List of Reported Contacts

System Acronym	System ID	Contact Full Name	Affiliation Type	Telephone Number
PCS	NY0005789	MANUG AYDIN	DMR REPORTING	5164883430
AIRS/AFS	NY0762209	ATREVOR WISDOM	EMISSIONS TRACKING	0000000000
RCRIS	NYD059358234	ROBERTO PORCELLI	NOTIFICATION DATA	7187824200
RCRIS	NYD059358234	WILLIAM J KAISER	PART A DATA	7183888114

List of Reported Organizations

System Acronym	System ID	Organization Name	Affiliation Type	DUNS Company Number
PCS	NY0005789		OPERATOR	
PCS	NY0005789	TERMINNALLE	OWNER	
RCRIS	NYD059358234	GULF OIL CORPORATION	CURRENT OPERATOR	
RCRIS	NYD059358234	GULF OIL CORP	CURRENT OWNER	

List of Docket Cases

System Acronym	System ID	Docket Case Number
DOCKET	02-92-0169-0001	02-92-0169
DOCKET	02-93-0097-0001	02-93-0097

<http://intranet.epa.gov/fiidcd/owa/FRS1111D>
Last Updated: 04/21/1998

DATE RETURNED _____
REASON _____

GULF OIL

☐ ACKNOWLEDGEMENT SENT

INTERNAL CHECKLIST

ID # NYD059358234

1. Interim Regulatory Requirements

- copy
- A. (1) FORM 1 MISSING ☐
(2) FORM 3 MISSING ☐
- B. POSTMARK after NOVEMBER 19, 1980 ☐ Valid ☐
- C. (1) DATE of OPERATION MISSING ☐
(2) DATE of OPERATION after NOVEMBER 19, 1980 ☐
- D. (1) NON-NOTIFIER ☐
(2) NOTIFIED after AUGUST 18, 1980 ☐ Valid ☐
- E. (1) FORM 1, VIII B SIGNATURE MISSING ☐
(2) FORM 3, IX B SIGNATURE MISSING ☐

2. { A. HANDLER ☐
B. NONREGULATED ☐
C. UNSURE ☐
D. UNKNOWN FACILITY ☐
(missing name and address on Form 3)
E. NEW FACILITY > NOV. 19, 1980 ☐
F. CORE ITEM(S) MISSING ☐
G. NON-CORE ITEM(S) MISSING ☐
H. OTHER ☐

MISSING :

MAP ☐
DRAWING ☐
PHOTO ☐

AOK.

* * * LISTING OF HANDLER IDENTIFICATION DATA * * *

Handler Name / ID / Address	S O N P V	Regulated Activities
DITMAS OIL ASSOCIATES INC	2 P	SG
NYD059358234 364 MASPETH AVE, BROOKLYN		

Low Income and Minority Score:

Source:

Other Regulators: S-State

EI610000GT04

Desc:

S-State

EI6100004013

Desc:

R-RCRA

NYD059358234

Desc:

N-NPDES

NY0005789

Desc:

Q-CDS

33344000038

Desc:

Mail Address: 364 MASPETH AVE
BROOKLYN

NY 11211

NOTIF RECEIPT: 08/06/98 CMNTS:
07/29/80NOTIF CONTACT: ROBERTO PORCELLI
(L) 364 MASPETH AVE
BROOKLYN

NY 11211

PHONE: 718-782-4200

PartA Receipt: 11/19/80 Cmmts: PROTECTIVE FILER

Current Owner: DITMAS OIL ASSOICATES INC

Address: 364 MASPETH AVE
BROOKLYN

NY 11211

Phone: 718/782-4200 SQ: 0003 TYPE: P

Current Operator: GULF OIL CORPORATION

Address: 433 HACKENSACK AVENUE

Phone: 201/488-4700 SQ: 0002 TYPE: P

Past Owner: GULF OIL CORP

Address: 433 HACKENSACK AVE
HACKENSACK

NJ 07601

Phone: 201/488-4700 SQ: 0001 TYPE: P STOPPED: 06/01/98

* * * * * E N D O F R E P O R T * * * * *



RCRIS NOTIFICATION DATA DISCREPANCY FORM

Form sent 12/14/99

Information from RCRIS

New Information (make change to "E" record only)

Facility Name: DITMAS OIL ASSOCIATES
Facility EPA ID Number: NYD059358234
Facility Address: 364 MASPETH AVE
City: BROOKLYN St: NY Zip: 11211
Mailing Address: _____
City: _____ St: _____ Zip: _____
Facility Contact: _____ Phone: - -
Owner/Operator: _____
SIC Code(s): _____
Waste Codes: _____
Generator Status (LQG/SQG) _____
Other: _____

Facility Name: GASETERIA OIL CORP.
Facility EPA ID Number: _____
Facility Address: _____
City: _____ St: _____ Zip: _____
Mailing Address: _____
City: _____ St: _____ Zip: _____
Facility Contact: _____ Phone: - -
Owner/Operator: _____
SIC Code(s): _____
Waste Codes: _____
Generator Status (LQG/SQG) _____
Other: _____

In response to this request, please modify RCRIS Handler Notification Data for the following:
General Generator Information: Add/Change Generator Status Codes:

<input checked="" type="checkbox"/>	Facility Name
<input type="checkbox"/>	Facility Address
<input type="checkbox"/>	Facility Contact
<input type="checkbox"/>	SIC Code(s)
<input type="checkbox"/>	Other

<input type="checkbox"/>	EPA ID Number
<input type="checkbox"/>	Mailing Address
<input type="checkbox"/>	Phone
<input type="checkbox"/>	Waste Code(s)

C	#	
	1	conditionally exempt Small Quantity Generator
	2	Definitionally Excluded Wastes
	3	Delisted Wastes
	4	One-time Hazardous Waste Generator
	5	Periodic Hazardous Waste Generator

C	#	
	6	No longer Generates HW; Still in Business
	7	No longer Generates HW; Out of Business
	8	Never Generated Hazardous Waste
	9	ID Number to Transport Non-Hazardous Waste
	1	Regulated Under Another ID
	0	Number(s) (list below)

Contact: Steven Petrucci Phone: x 3129

Effective Date of Change: 5/28/99

Rec 314

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

D.H. Beck
Gulf Oil
364 Maspeth Avenue
Brooklyn, NY 11211

Dear Mr. Beck:

Re: Reclassification of EPA I.D. No. NYD059358234

The New York State Department of Environmental Conservation (DEC) is now fully responsible for administration of the Resource Conservation and Recovery Act (RCRA) regulatory program for hazardous waste facilities operating under interim status with Part A RCRA Permits.

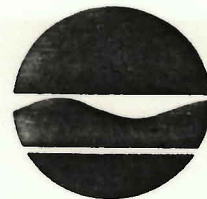
In order to qualify as an interim status hazardous waste treatment, storage or disposal (TSD) facility pursuant to Section 3005(e) of RCRA and 6NYCRR Part 373, a facility was required to be in existence on November 19, 1980, and to be conducting a hazardous waste activity requiring a RCRA and/or Part 373 Permit. Based on information submitted by your company, it appears that your facility has never qualified for interim status pursuant to Section 3005(e) of RCRA and/or 6NYCRR Part 373, insofar as it never conducted a RCRA or 373 permittable activity. Therefore, DEC considers your facility to never have operated with interim status under a Part A Permit.

If you have any information which would otherwise indicate that your facility had or does qualify for interim status under RCRA or Part 373, it must be submitted within 14 calendar days of the date of this letter. If you do not respond to this letter within the time provided, your facility will be removed from the list of active TSD facilities.

Please be advised that withdrawal of your Part A Permit application terminates your privilege to operate with interim status in the future. Should you decide to conduct any activity not exempt from the permit requirements of 6NYCRR Part 373 and/or 40 CFR Parts 264, 265 and 270, you must first obtain full Part 373 and RCRA Permits. Failure to obtain the proper permits will subject you to enforcement actions pursuant to Section 3008 of RCRA and Article 27, Titles 7 and 9 of the Environmental Conservation Law.

RAY-
Concurrence?

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PAB *re*



Henry G. Williams
Commissioner

FEB 21 1986

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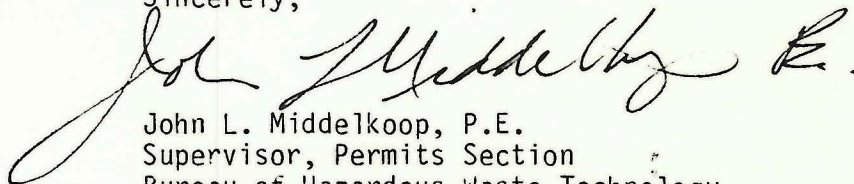
1880
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1881

Mr. D.H. Beck

2.

Should you have any questions concerning this matter, please contact Mr. Robert Kircher, of my staff, at (518) 457-3274.

Sincerely,

A handwritten signature in dark ink, appearing to read "John L. Middelkoop". The signature is fluid and cursive, with a large initial "J" and a distinct "L".

John L. Middelkoop, P.E.
Supervisor, Permits Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: Richard A. Baker (EPA Region II - Permits Administration Branch)
Stan Siegal (EPA Region II - Solid Waste Branch)
David Mafrici (NYSDEC - Bureau of Hazardous Waste Operations)
S. Ervolina (Regional Hazardous Waste Engineer, NYSDEC - Region 2)

THESE ARE THE RESULTS OF THE ANALYSIS OF THE SAMPLES
OBTAINED FROM THE SITE OF THE DISASTER. THE ANALYSIS
WAS CONDUCTED BY THE LABORATORY OF THE
FEDERAL BUREAU OF INVESTIGATION.

DATE: 10/10/1984
BY: J. A. [illegible]
FOR: [illegible]

[illegible signature]

THIS REPORT IS THE PROPERTY OF THE FBI. IT IS TO BE RETURNED TO THE FBI OFFICE OF ORIGIN UPON REQUEST.

Gulf Oil Company - U.S.

364 Maspeth Avenue
Brooklyn, New York 11211

April 29, 1982

Anna R. Saracco
Engineering Technician
Solid Waste Management Program
Region 2 Office

During your inspection of our Greenpoint, NY Terminal, on Tuesday, April 27, 1982, we were unable to find our copy of the hazardous Waste Manifest showing that S & W Waste in South Kearney, NJ, did in fact receive this waste.

Attached is a copy of the signed manifest which we have received from S & W Waste.

RECEIVED
N.Y.S.D.E.C.-REGION 2
MAY 4 1982
SOLID WASTE

Sincerely Yours,

W.G. Donohue
W.G. Donohue
OFFICE MANAGER

cc: W. Krompinger

ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10001

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